

Daniel D. Doyle (*pro hac* pending)
Nicholas A. Franke (*pro hac* pending)
David M. Brown (*pro hac* pending)
SPENCER FANE BRITT & BROWNE, LLP
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Presentment Date
November 29, 2005
10:00 a.m.

J. Brian McTigue (*pro hac* pending)
Cornish F. Hitchcock (*pro hac* pending)
MCTIGUE LAW FIRM
5301 Wisconsin Ave. N.W., Suite 350
Washington, DC 20015
(202) 364-6900 - telephone
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COUNSEL FOR MICHAEL BEARD, RUSSELL DETWILER, FLOYD JONES AND JOHN
M. MCGRATH, as retirees not covered by collective bargaining agreements.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	CASE No. 05-44481 (RDD)
)	Jointly Administered
DELPHI CORPORATION, et al.,)	
)	Chapter 11
Debtors.)	

**NOTICE OF PRESENTMENT OF ORDER FOR MOTION TO VACATE OR AMEND
ORDER (I) APPOINTING UNIONS AS AUTHORIZED REPRESENTATIVES FOR
UNION-REPRESENTED RETIREES UNDER 11 U.S.C. §§ 1114(C) OR 1114(D) OR, IN
THE ALTERNATIVE, (II) ESTABLISHING PROCEDURES FOR SOLICITATION,
NOMINATION, AND APPOINTMENT OF COMMITTEE OF RETIRED EMPLOYEES
(THE RETIREE COMMITTEE ORDER)**

PLEASE TAKE NOTICE that, upon the Motion of Michael Beard, Russell Detwiler, Floyd Jones, and John M. McGrath to Vacate or Amend Order (I) Appointing Unions as Authorized Representatives for Union-Represented Retirees Under 11 U.S.C. §§ 1114 or 1114 or, in the Alternative, (II) Establishing Procedures for Solicitation, Nominations, and Appointment of Committee of Retired Employees, the undersigned will present the proposed order to the Honorable

Robert D. Drain, United States Bankruptcy Judge, for signature on November 29, 2005, at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed orders, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the orders may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

DATED: November 4, 2005

SPENCER FANE BRITT & BROWNE

/s/ Daniel D. Doyle

Daniel D. Doyle (*pro hac* pending)

Nicholas A. Franke (*pro hac* pending)

David M. Brown (*pro hac* pending)

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ATTORNEY FOR OFFICIAL COMMITTEE
OF RETIREES

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the persons on the attached list were served with the foregoing document by the Bankruptcy Court's ECF System or by first-class U.S. mail, postage pre-paid, on the 4th day of November, 2005 to Office of the United States Trustee, counsel for the Debtors, the relevant unions, proposed counsel for the Official Committee of Unsecured Creditors, and counsel for the agent under Debtors' post-petition credit facility..

/s/ Kim Collier